

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

COY PHELPS

PETITIONER

- v -

DAVID WINH, et.al.

RESPONDENT(S)

CASE No:

MOTION FOR
APPOINTMENT OF COUNSEL
05-40003

COMES NOW THE ABOVE PETITIONER COY PHELPS AND MOVES THIS COURT TO APPOINT A COUNSEL TO REPRESENT HIM IN THE ABOVE CAPTIONED CASE FOR THE FOLLOWING REASONS:

1. PHELPS IS UNLEARNED IN THE LAWS AND JUDICIAL PROCEDURES;
2. PHELPS IS 71 YEARS OLD AND HAVE MEDICAL INFIRMITIES AND MALADIES WHICH LIMITS AND RESTRICTS HIS ABILITIES;
3. THE GOVERNMENT, AND THE COURTS, HAVE DECLARED PHELPS INSANE;
4. THE CASE WILL REQUIRE EXTENSIVE DISCOVERY; THE COLLECTION, COMPILATION, AND ANALYSIS OF DATA, FACTS, AND INFORMATION; THE ISSUANCE OF INTERROGATIONS AND THE TAKING OF DEPOSITIONS; THE INVESTIGATION OF RECORDS; THE EXAMINATION AND CROSS EXAMINATION OF WITNESSES; AND A PROFESSIONAL PRESENTATION TO THE COURT AND JURY; OF WHICH PHELPS HAS NO SKILLS, KNOWLEDGE, OR EXPERIENCE.

DATE:

IN PROSE

COY PHELPS 78872-011

P.O. BOX 879

AYER, MASSACHUSETTS 01432